

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

ALISA JOHNSON, LAURA DAY, and
KOREY THOMAS,

Plaintiffs,

v.

ACTIVEHOURS, INC. d/b/a EARNIN,

Defendant.

Case No. 1:24-cv-02283-JRR

AFFIDAVIT OF NAKIA BLACKWELL

I, Nakia Blackwell, declare:

1. I am over eighteen years of age. I have been employed by Activehours, Inc. d/b/a EarnIn ("EarnIn") as a Paralegal since June 20, 2023. In my role I am responsible for, among other things, retrieving official EarnIn documents and policies. I make the statements in this affidavit based on my personal knowledge of the matters set forth below and based upon my review of EarnIn's records that are maintained in the ordinary course of business. If called as a witness, I could and would testify competently to the matters stated herein.
2. Below I describe five documents attached to my affidavit.

Documents Attached to my Affidavit

3. **Exhibit A**, attached to this affidavit, is a true and correct copy of EarnIn's Cash Out User Agreement, effective as of January 15, 2024, and published by EarnIn. EarnIn's Cash Out User Agreement is publicly available on its website at <https://www.earnin.com/privacyandterms/cash-out/terms-of-service/archives/2024-01-15?fromTerms=true>. I personally retrieved this document from EarnIn's records, which I also downloaded from EarnIn's website on November 10, 2025.
4. **Exhibit B**, attached to this affidavit, is a true and correct copy of EarnIn's Transfer Out

Authorization Agreement effective on February 29, 2024, a copy of which was downloaded on November 14, 2025. The Transfer Out Authorization Agreement is publicly available at <https://web.archive.org/web/20240229234618/https://www.earnin.com/privacyandterms/transfer-out-authorization-agreement>. This document also contains this same language found in prior and subsequent versions of EarnIn's Transfer Out Authorization Agreement: "You may revoke your authorizations by emailing care@earnin.com."

5. **Exhibit C**, attached to this affidavit, is a true and correct copy of Plaintiff Laura Day's Cash Out transaction records for the period from April 8, 2019 through November 14, 2025. In the ordinary course of my work as a paralegal, I coordinated the retrieval of the *Johnson* Plaintiffs' transaction histories from EarnIn's customer database on November 14, 2025.
6. **Exhibit D**, attached to this affidavit, is a true and correct copy of Plaintiff Alisa Johnson's Cash Out transaction records for the period from June 8, 2022 through November 14, 2025. In the ordinary course of my work as a paralegal, I coordinated the retrieval of the *Johnson* Plaintiffs' transaction histories from EarnIn's customer database on November 14, 2025.
7. **Exhibit E**, attached to this affidavit, is a true and correct copy of Plaintiff Korey Thomas's Cash Out transaction records for the period from January 11, 2019 through November 14, 2025. In the ordinary course of my work as a paralegal, I coordinated the retrieval of the *Johnson* Plaintiffs' transaction histories from EarnIn's customer database on November 14, 2025.

I declare under penalty of perjury that the foregoing is true and correct according to the best of my knowledge, information, and belief. Executed on this 14th day of November, 2025 in

Chesterfield County, Virginia



Nakia Blackwell